

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 20-cr-20599
Hon. Matthew F. Leitman

JOHN ANGELO, *et al.*,

Defendants.

/

**ORDER CONCERNING ADMISSIBILITY OF FIRST SET OF
GOVERNMENT’S PROPOSED EXHIBITS**

On April 3, 2023, the Court held an in-person hearing to hear argument on the admissibility of certain trial exhibits proposed by the Government and identified below. The Court ruled on the admissibility of the Government’s exhibits as documented in the chart below, and for the reasons explained on the record.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court’s Ruling
201	HSMM BOA acct 9815 checks to NJC Marketing	-Authentication - FRE 803(6)(A)-(C), 902(11), and 902(13) [Certification] -Relevance – FRE 401, 402 [Testimony of David Katz or others]	<i>No objection</i>	Admitted (No Objections)

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
202	Quickbooks HSMMA BOA acct 9815 checks to NJC Marketing 2015_2016	-Authentication -FRE 901(a), 901(b)(1), (b)(4) [Testimony of David Katz or others] -Relevance – FRE 401, 402 [Testimony of David Katz or others]	<i>No objection</i>	Admitted (No Objections)
202A	Quickbooks HSMMA checks to BlueHorseshoe 2013 to 2017	-Authentication -FRE 901(a), 901(b)(1), (b)(4) [Testimony of David Katz or others] -Relevance – FRE 401, 402 [Testimony of David Katz or others]	<i>No objection</i>	Admitted (No Objections)
203	[currently withdrawn from consideration]	-Authentication - FRE 801(d)(1)(A)-(B), 901(b)(1), (b)(4), (b)(7) -Relevance – FRE 401, 402 [Testimony of David Katz or others]		No Ruling (Exhibit Withdrawn)
211	<i>Documents provided by Defense Counsel for Rosina Angelo A</i>	-Authentication - FRE 613 -Relevance – FRE 401, 402 [Testimony of Defense Witness]	<i>Objection – relevance FRE 401 (JA)</i>	Excluded
212	<i>Documents provided by Defense Counsel for Rosina Angelo B</i>	-Authentication - FRE 613 -Relevance – FRE 401, 402 [Testimony of Defense Witness]	<i>Objection – relevance FRE 401 (JA)</i>	Excluded
213	<i>Documents provided by Defense Counsel for Rosina Angelo C</i>	-Authentication - FRE 613 -Relevance – FRE 401, 402 [Testimony of Defense Witness]	<i>Objection – relevance FRE 401 (JA)</i>	Excluded

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
214	<i>Documents provided by Defense Counsel for Rosina Angelo D</i>	-Authentication - FRE 613 -Relevance – FRE 401, 402 [Testimony of Defense Witness]	<i>Objection – relevance FRE 401 (JA)</i>	Excluded
215	<i>Documents provided by Defense Counsel for Rosina Angelo E</i>	-Authentication - FRE 613 -Relevance – FRE 401, 402 [Testimony of Defense Witness]	<i>Objection – relevance FRE 401 (JA)</i>	Excluded
216	<i>Documents provided by Defense Counsel for Rosina Angelo F</i>	-Authentication - FRE 613 -Relevance – FRE 401, 402 [Testimony of Defense Witness]	<i>Objection – relevance FRE 401 (JA)</i>	Excluded
217	<i>Documents provided by Defense Counsel for Rosina Angelo G</i>	-Authentication - FRE 613 -Relevance – FRE 401, 402 [Testimony of Defense Witness]	<i>Objection – relevance FRE 401 (JA)</i>	Excluded
218	<i>Documents provided by Defense Counsel for Rosina Angelo H</i>	-Authentication - FRE 613 -Relevance – FRE 401, 402 [Testimony of Defense Witness]	<i>Objection – relevance FRE 401 (JA)</i>	Excluded
3001	NBKC Bank Mortgage Loan File Rosina Angelo records A	-Authentication - FRE 613, 803(6)(A)-(C), 902(11), and 902(13) [Certification] -Relevance – FRE 401, 402 [Testimony of Defense Witness or others]	<i>Objection – relevance FRE 401 (JA)</i>	Excluded

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
3001A	NBKC Bank cert records	-Authentication - FRE 613, 803(6)(A)-(C), 902(11), and 902(13) [Certification] -Relevance – FRE 401, 402 [Testimony of Defense Witness or others]	<i>Objection – relevance FRE 401 (JA)</i>	Excluded. Government may renew request for admission if Defendants open the door.
3002	NBKC Bank Mortgage Loan File Rosina Angelo records B	-Authentication - FRE 613, 803(6)(A)-(C), 902(11), and 902(13) [Certification] -Relevance – FRE 401, 402 [Testimony of Defense Witness or others]	<i>Objection – relevance FRE 401 (JA)</i>	Excluded
4001	[currently withdrawn from consideration]	-Authentication - FRE 801(d)(1)(A)-(B), 901(b)(1), (b)(4), (b)(7) -Relevance – FRE 401, 402 [Testimony of Aaron Korson or others]	<i>Objection – hearsay FRE 801, 802 (JA)</i>	No Ruling (Exhibit Withdrawn)
4002	[currently withdrawn from consideration]	-Authentication - FRE 801(d)(1)(A)-(B), 901(b)(1), (b)(4), (b)(7) -Relevance – FRE 401, 402 [Testimony of Aaron Korson or others]	<i>Objection – hearsay FRE 801, 802 (JA)</i>	No Ruling (Exhibit Withdrawn)
4003	[currently withdrawn from consideration]	-Authentication - FRE 801(d)(1)(A)-(B), 901(b)(1), (b)(4), (b)(7) -Relevance – FRE 401, 402 [Testimony of Aaron Korson or others]	<i>Objection – hearsay FRE 801, 802 (JA)</i>	No Ruling (Exhibit Withdrawn)

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4004	[currently withdrawn from consideration]	-Authentication - FRE 801(d)(1)(A)-(B), 901(b)(1), (b)(4), (b)(7) -Relevance – FRE 401, 402 [Testimony of Aaron Korson or others]	<i>Objection – hearsay FRE 801, 802 (JA)</i>	No Ruling (Exhibit Withdrawn)
4005	[currently withdrawn from consideration]	-Authentication - FRE 801(d)(1)(A)-(B), 901(b)(1), (b)(4), (b)(7) -Relevance – FRE 401, 402 [Testimony of Aaron Korson or others]	<i>Objection – hearsay FRE 801, 802 (JA)</i>	No Ruling (Exhibit Withdrawn)
4006	[currently withdrawn from consideration]	-Authentication - FRE 801(d)(1)(A)-(B), 901(b)(1), (b)(4), (b)(7) -Relevance – FRE 401, 402 [Testimony of Aaron Korson or others]	<i>Objection – hearsay FRE 801, 802 (JA)</i>	No Ruling (Exhibit Withdrawn)
4007	[currently withdrawn from consideration]	-Authentication - FRE 801(d)(1)(A)-(B), 901(b)(1), (b)(4), (b)(7) -Relevance – FRE 401, 402 [Testimony of Aaron Korson or others]	<i>Objection – hearsay FRE 801, 802 (JA)</i>	No Ruling (Exhibit Withdrawn)

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4007A	10/13/15 audio re ThomasQuartz, Aaron Korson re startup of MAA combined with Law Offices of Thomas Quartz receiving cases from JohnCapella	-Authentication -FRE 901(a), 901(b)(1), (b)(4), (b)(5), (b)(6) [Testimony of Aaron Korson or others] -Relevance – FRE 401, 402 [Testimony of Aaron Korson or others]	- “Recordings not provided as separate audio clips for these 3 exhibits. <i>Include gossip and other irrelevant discussions.</i> <i>401, 403 and 801” (JA sent via 3/21/23 email)</i> <i>-TQ not present for call</i>	Defense counsel to propose redactions. Court will address admissibility at trial if parties are unable to agree on redactions and, thereafter, on admissibility.
4007B	10/13/15 audio re JohnAngelo, ThomasQuartz, Aaron Korson re startup of MAA combined with Law Offices of Thomas Quartz receiving cases from JohnCapella	-Authentication -FRE 901(a), 901(b)(1), (b)(4), (b)(5), (b)(6) [Testimony of Aaron Korson or others] -Relevance – FRE 401, 402 [Testimony of Aaron Korson or others]	- “Recordings not provided as separate audio clips for these 3 exhibits. <i>Include gossip and other irrelevant discussions.</i> <i>401, 403 and 801” (JA sent via 3/21/23 email)</i> <i>-TQ not present for call</i>	Defense counsel to propose redactions. Court will address admissibility at trial if parties are unable to agree on redactions and, thereafter, on admissibility.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4007C	10/13/15 audio re JohnAngelo, ThomasQuartz, Aaron Korson re startup of MAA combined with Law Offices of Thomas Quartz receiving cases from JohnCapella	-Authentication -FRE 901(a), 901(b)(1), (b)(4), (b)(5), (b)(6) [Testimony of Aaron Korson or others] -Relevance – FRE 401, 402 [Testimony of Aaron Korson or others]	- “Recordings not provided as separate audio clips for these 3 exhibits. Include gossip and other irrelevant discussions. 401, 403 and 801” (JA sent via 3/21/23 email) -TQ not present for call	Defense counsel to propose redactions. Court will address admissibility at trial if parties are unable to agree on redactions and, thereafter, on admissibility.
4008	11 30 15 text JohnCapella to ThomasQuartz AaronKorson re Joe Strawther client from BrentSitto	-Authentication -FRE 901(a), 901(b)(1), (b)(4) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	Objection – relevance FRE 401 (JA) - “401, 801” (JA sent via 3/21/23 email) - “Irrelevant FRE 401, 403; Hearsay FRE 801(c), 802; Incomplete FRE 106 Special Agent, Anthony Sereno lack foundation need link by link chain that Joe Strawther report sent from Karen Miller” (BS sent via 3/23/23 email) REDACT	Excluded
4009	8/1/16 Market Me Now LLC , Robin Street Consultants LLC Agreement executed John Angelo Ramil Yusubov	-Authentication -FRE 901(a), 901(b)(1), (b)(4) [Testimony of Ramil Yusubov or others] -Relevance – FRE 401, 402 [Testimony of Ramil Yusubov or others]	No objection	Admitted (No Objections)

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4009A	Market Me Now LLC JPMorgan Chase acct3520 checks payable to Robin Street ; check 3465 dated 9/1/16 for \$6,000 ; check 3474 dated 5/24/17 for \$6,000 ; check 3476 dated 12/14/17 for \$60,000o	-Authentication - FRE 803(6), 902(11) [Certification] -Relevance - FRE 401, 402 [Testimony of Ramil Yusubov or others]	<i>No objection</i>	Admitted (No Objections)
4010	WCIS QuickBooks excerpt re payments to NJC Marketing 9/10/10 to 12/13/13	-Authentication -FRE 901(a), 901(b)(1), (b)(4) [Testimony of Joseph DeSanto] -Relevance – FRE 401, 402 [Testimony of Joseph DeSanto or others]	<i>Objection – relevance re scope/timeframe FRE 401 (BS)</i>	Admissible to prove modus operandi.
4010A	WCIS BOA acct6613 checks to NJC Marketing 2010 to 2013	-Authentication - FRE 803(6), 902(11) [Certification] -Relevance - FRE 401, 402 [Testimony of Joseph DeSanto or others]	<i>Objection – relevance re scope/timeframe FRE 401 (BS)</i>	Admissible to prove modus operandi.
4010B	WCIS BOA acct6613 checks to Sereno Marketing 2010 to 2013	-Authentication - FRE 803(6), 902(11) [Certification] -Relevance - FRE 401, 402 [Testimony of Joseph DeSanto or others]	<i>Objection – relevance re scope/timeframe FRE 401 (BS)</i>	Admissible to prove modus operandi.
4010C	NJC Marketing Wells Fargo acct 6031 Deposit Items 2014 to 2017	-Authentication - FRE 803(6), 902(11) [Certification] -Relevance - FRE 401, 402 [Testimony of David Katz or others]	<i>No objection</i>	Admissible to prove modus operandi.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4010D	9/10/13, 10/13/13, 11/27/13 messages from RosinaAngelo to Integrated HCS re Sereno JohnAngelo	-Authentication -FRE 901(a), 901(b)(1), (b)(4) [Testimony of Joseph DeSanto] -Relevance – FRE 401, 402 [Testimony of Joseph DeSanto or others]	<i>Objection – Objection – hearsay FRE 801, 802 (JA); relevance re scope/timeframe FRE 401 (BS)</i>	Excluded
4010E	10/23/13 email RosinaAngelo VincentCelentano JosephDeSanto re payments from Integrated HCS re Sereno JohnAngelo	-Authentication -FRE 901(b)(1), (b)(4), (b)(7) [Testimony of Joseph DeSanto] -Relevance – FRE 401, 402 [Testimony of Joseph DeSanto or others]	<i>Objection – Objection – hearsay FRE 801, 802 (JA); relevance re scope/timeframe FRE 401 (BS)</i>	Excluded
4012	Robin Street Consultants BOA acct 3107 signature card	-Authentication - FRE 803(6), 902(11) [Certification] -Relevance - FRE 401, 402 [Testimony of Tracy Varjabedian or others]	<i>Objection – foundation through witness Varjabedian FRE 401, 402 (CM)</i>	Admissible if Government successfully lays appropriate foundation at trial.
4012A	Robin Street Consultants BOA acct ending 3107 bank statements 033114 to 123117	-Authentication - FRE 803(6), 902(11) [Certification] -Relevance - FRE 401, 402 [Testimony of Tracy Varjabedian or others]	<i>Objection – foundation through witness Varjabedian FRE 401, 402 (CM); relevance FRE 401 (JA)</i> <i>- “401, 403” (JA sent via 3/21/23 email)</i>	Admissible if Government successfully lays appropriate foundation at trial.
4012B	Robin Street Consultants BOA acct ending 3107 deposits/checks	-Authentication - FRE 803(6), 902(11) [Certification] -Relevance - FRE 401, 402 [Testimony of Tracy Varjabedian or others]	<i>Objection – foundation through witness Varjabedian FRE 401, 402 (CM); relevance FRE 401 (JA)</i>	Admissible if Government successfully lays appropriate foundation at trial.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4012C	Robin Street Consultants BOA acct ending 3107 client checks 2014 to 2017	-Authentication - FRE 803(6), 902(11) [Certification] -Relevance - FRE 401, 402 [Testimony of Tracy Varjabedian or others]	<i>Objection – foundation through witness Varjabedian FRE 401, 402 (CM)</i>	Admissible if Government successfully lays appropriate foundation at trial.
4012D	Robin Street Consultants BOA acct ending 3107 deposits re Auto Accident Attorneys	-Authentication - FRE 803(6), 902(11) [Certification] -Relevance - FRE 401, 402 [Testimony of Tracy Varjabedian or others]	- “need Certification referenced FRE 803(6), 902(11) Tracy Varjabedian lacks foundation” (BS sent via 3/23/23 email)	Admissible if Government successfully lays appropriate foundation at trial.
4012E	Robin Street Consultants BOA acct ending 3107 deposits re Clear Imaging	-Authentication - FRE 803(6), 902(11) [Certification] -Relevance - FRE 401, 402 [Testimony of Tracy Varjabedian or others]	<i>No objection</i>	Admitted (No Objections)
4012F	Robin Street Consultants BOA acct ending 3107 deposits re Horizon Imaging	-Authentication - FRE 803(6), 902(11) [Certification] -Relevance - FRE 401, 402 [Testimony of Tracy Varjabedian or others]	<i>No objection</i>	Admitted (No Objections)
4012G	Robin Street Consultants BOA acct ending 3107 deposits re Standard Medicals & Standard Care	-Authentication - FRE 803(6), 902(11) [Certification] -Relevance - FRE 401, 402 [Testimony of Tracy Varjabedian or others]	<i>No objection</i>	Admitted (No Objections)

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4012H	<i>Robin Street Consultants BOA acct ending 3107 checks written excerpts</i>	-Authentication - FRE 803(6), 902(11) [Certification] -Relevance - FRE 401, 402 [Testimony of Tracy Varjabedian or others]	<i>Objection – relevance FRE 401 (JA)</i>	Admitted
4013	J&A Consultants Inc BOA acct 4799 signature card	-Authentication - FRE 803(6), 902(11) [Certification] -Relevance - FRE 401, 402 [Testimony of Tracy Varjabedian or others]	<i>Objection – Authentication 803(6), 902 (11) (JA)</i>	Admitted
4013A	J&A Consultants BOA acct 4799 statements 022015 to 053118	-Authentication - FRE 803(6), 902(11) [Certification] -Relevance - FRE 401, 402 [Testimony of Tracy Varjabedian or others]	<i>Objection – relevance FRE 401 (JA)</i> <i>- “401, 403” (JA sent via 3/21/23 email)</i>	Admissible with Redactions Discussed on Record
401B	J&A Consultants Inc BOA acct 4799, deposit items	-Authentication - FRE 803(6), 902(11) [Certification] -Relevance - FRE 401, 402 [Testimony of Tracy Varjabedian or others]	<i>Objection – relevance FRE 401 (JA)</i>	Admitted

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4015	6/9/14 email JohnCapella BrentSitto GlennFranklin re Leads Not From You : 6 Detroit DJA leads	<p>-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others]</p> <p>-Relevance – FRE 401, 402 [Testimony of John Capella or others]</p>	<p><i>Objection – hearsay FRE 801, 802 (JA); authentication re certification document 803(6), 902 (11) (BS)</i></p> <p><i>“Partial objection for page 1 based on hearsay (ok with the reports from page 2 to 13 coming in – reports)” (JA sent via 3/21/23 email)</i></p> <p><i>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c) 802 need link by link chain that the 6 reports came from Karen Miller” (BS sent via 3/23/23 email)</i></p>	Admissible with Redactions Discussed on Record
4016	9/28/15 email JohnCapella GlennFranklin BrentSitto re all police reports must be obtained from LexisNexis moving forward	<p>-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others]</p> <p>-Relevance – FRE 401, 402 [Testimony of John Capella or others]</p>	<p><i>Objection – hearsay FRE 801, 802 (JA); authentication re certification document 803(6), 902 (11) (BS)</i></p> <p><i>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 irrelevant and prejudicial, confusing, misleading, waste of time as this concerns separate paid-for reports, not reports from Karen Miller FRE 401,403” (BS sent via 3/23/23 email)</i></p>	Admitted

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4017A	3/4/14 email JohnCapella BrentSitto GlennFranklin Scott Jawetz re Disturbing Lead Trend	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection – hearsay FRE 801, 802 (JA); relevance re scope/timeframe FRE 401 (BS)</i> <i>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 before conspiracy alleged to have started in July 2014 and before Miller accessing from LexisNexis went interstate on approximately 2-7-2015 FRE 401,403 irrelevant and prejudicial, confusing, misleading, waste of time as this concerns separate paid-for reports, not reports from Karen Miller FRE 401,403” (BS sent via 3/23/23 email)</i>	Admitted

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4017B	3/7/14 email JohnCapella BrentSitto GlennFranklin Scott Jawetz re Lead Status Update	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection – hearsay FRE 801, 802 (JA); relevance re scope/timeframe FRE 401 (BS)</i> <i>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 before conspiracy alleged to have started in July 2014 and before Miller accessing from LexisNexis went interstate on approximately 2-7-2015 FRE 401,403 irrelevant and prejudicial, confusing, misleading, waste of time as this concerns separate paid-for reports, not reports from Karen Miller FRE 401,403” (BS sent via 3/23/23 email)</i>	Admitted

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4017C	3/10/14 email JohnCapella BrentSitto GlennFranklin Scott Jawetz re Lead Status Update: Still No New Detroit Leads	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection – hearsay FRE 801, 802 (BS); relevance re scope/timeframe FRE 401 (BS)</i> <i>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 before conspiracy alleged to have started in July 2014 and before Miller accessing from LexisNexis went interstate on approximately 2-7-2015 FRE 401,403 irrelevant and prejudicial, confusing, misleading, waste of time as this concerns separate paid-for reports, not reports from Karen Miller FRE 401,403” (BS sent via 3/23/23 email)</i>	Admitted

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4017D	4/14/14 email JohnCapella BrentSitto GlennFranklin Scott Jawetz re Detroit Leads Back Up and Running	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection – hearsay FRE 801, 802 (BS); relevance re scope/timeframe FRE 401 (BS)</i> <i>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 before conspiracy alleged to have started in July 2014 and before Miller accessing from LexisNexis went interstate on approximately 2-7-2015 FRE 401,403 irrelevant and prejudicial, confusing, misleading, waste of time as this concerns separate paid-for reports, not reports from Karen Miller FRE 401,403” (BS sent via 3/23/23 email)</i>	Admitted

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4017D1	4/15/14 email ElviraCimic JohnCapella re StandardMedical Disability Certificates	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of Elvira Cimic or others] -Relevance – FRE 401, 402 [Testimony of Elvira Cimic or others]	<i>Objection – hearsay FRE 801, 802 (BS); relevance re scope/timeframe FRE 401 (BS)</i> <i>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 before conspiracy alleged to have started in July 2014 and before Miller accessing from LexisNexis went interstate on approximately 2-7-2015 FRE 401,403 irrelevant and prejudicial, confusing, misleading, waste of time as this has nothing to do with accessed crash reports FRE 401,403” (BS sent via 3/23/23 email)</i>	No Ruling (Exhibit Withdrawn)

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4017E	5/17/14, 4/24/14 email JohnCapella ScottJawetz MariaDuPuis BrentSitto re Castell Messed Up and Health Systems	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection – hearsay FRE 801, 802 (BS)</i> <i>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 before the conspiracy alleged to have started in July 2014 and before Miller accessing from LexisNexis went interstate on approximately 2-7-2015 FRE 401,403 irrelevant and prejudicial, confusing, misleading, waste of time as this does not concern a report accessed by Karen Miller and sent down a chain to Capella FRE 401,403” (BS sent via 3/23/23 email)</i>	No Ruling (Exhibit Withdrawn)

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4017 E1	10/13/14 email BrentSitto JohnCapella re intake	<p>-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others]</p> <p>-Relevance – FRE 401, 402 [Testimony of John Capella or others]</p>	<p><i>Objection – hearsay FRE 801, 802 (BS)</i></p> <p>- “401” (JA sent via 3/21/23 email)</p> <p>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 before Miller accessing from LexisNexis went interstate on approximately 2-7-2015, so not wire fraud, irrelevant and prejudicial FRE 401, 403 need link by link chain that Kenya Allen report sent from Karen Miller” (BS sent via 3/23/23 email)</p> <p>REDACT</p>	No Ruling (Exhibit Withdrawn)

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4017 E2	10/15/14 email JohnCapella SilvioCozzetto ScottJawetz JohnAngelo BrentSitto re referral from BeWell to AutoAccidentAtt orneys	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection – hearsay FRE 801, 802 (BS)</i> <i>- “401” (JA sent via 3/21/23 email)</i> <i>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 before Miller accessing from LexisNexis went interstate on approximately 2-7-2015, so not wire fraud, irrelevant and prejudicial FRE 401, 403 need link by link chain that Kenya Allen report sent from Karen Miller” (BS sent via 3/23/23 email)</i> REDACT	Excluded. Government may renew request for admission if Defendants open door.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4017 E3	10/21/14 email JohnCapella BrentSitto ElviraCimic re why C_Greene declined	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection – hearsay FRE 801, 802 (BS)</i> <i>- “401” (JA sent via 3/21/23 email)</i> <i>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 before Miller accessing from LexisNexis went interstate on approximately 2-7-2015, so not wire fraud, irrelevant and prejudicial FRE 401, 403 need link by link chain that Kenya Allen report sent from Karen Miller” (BS sent via 3/23/23 email)</i> REDACT	Excluded. Government may renew request for admission if Defendants open door.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4017 E4	10/22/14 email JohnCapella BeWell re C_Greene notice to Cozzetto	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	Objection – hearsay FRE 801, 802 (BS) - “401” (JA sent via 3/21/23 email) - “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 before Miller accessing from LexisNexis went interstate on approximately 2-7-2015, so not wire fraud, irrelevant and prejudicial FRE 401, 403 need link by link chain that Kenya Allen report sent from Karen Miller” (BS sent via 3/23/23 email) REDACT	Excluded. Government may renew request for admission if Defendants open door.
4017F	11/28/14, 11/24/14, 11/12/14 email BrentSito JohnCapella DavidKatz DaleKatz MariaDuPuis re C_Sanders UNAPPROVED report and complaint re confirmation codes	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	Objection – hearsay FRE 801, 802 (BS) - “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 before Miller accessing from LexisNexis went interstate on approximately 2-7-2015, so not wire fraud, irrelevant and prejudicial FRE 401, 403 need link by link chain that Cynthia Sanders report sent from Karen Miller” (BS sent via 3/23/23 email) REDACT	Excluded. Government may renew request for admission if Defendants open door.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4017G	11/28/14 , 10/28/14 BrentSitto JohnCapella re D_Johnson UNAPPROVED report BrentSitto to JohnCapella re client no show	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	Objection – hearsay FRE 801, 802 (BS) - “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 before Miller accessing from LexisNexis went interstate on approximately 2-7-2015, so not wire fraud, irrelevant and prejudicial FRE 401, 403 need link by link chain that Dayla Johnson report sent from Karen Miller” (BS sent via 3/23/23 email REDACT	Excluded. Government may renew request for admission if Defendants open door.
4017H	11/28/14 , 10/28/14 BrentSitto JohnCapella re C_Tatume UNAPPROVED report BS to JC re client no show	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	Objection – hearsay FRE 801, 802 (BS) - “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 before Miller accessing from LexisNexis went interstate on approximately 2-7-2015, so not wire fraud, irrelevant and prejudicial FRE 401, 403 need link by link chain that Candace Tatume report sent from Karen Miller” (BS sent via 3/23/23 email) REDACT	Excluded. Government may renew request for admission if Defendants open door.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4017I	11/28/14 , 10/9/14, 10/8/14 BrentSitto JohnCapella re T_Thomas UNAPPROVED report BS to JC re client no show	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	Objection – hearsay FRE 801, 802 (BS) - “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 before Miller accessing from LexisNexis went interstate on approximately 2-7-2015, so not wire fraud, irrelevant and prejudicial FRE 401, 403 need link by link chain that Tanyetta Thomas report sent from Karen Miller” (BS sent via 3/23/23 email) REDACT	Excluded. Government may renew request for admission if Defendants open door.
4017J	11/28/14 email BrentSitto JohnCapella re complaints about three no show clients and Health Systems	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	Objection – hearsay FRE 801, 802 (BS) - “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 before Miller accessing from LexisNexis went interstate on approximately 2-7-2015, so not wire fraud, irrelevant and prejudicial FRE 401, 403 need link by link chain that Tanyetta Thomas, Dayla Johnson, and Candace Tatume reports sent from Karen Miller (redactions if not)” (BS sent via 3/23/23 email) REDACT	Excluded. Government may renew request for admission if Defendants open door.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4017K	11/28/14 email BrentSitto JohnCapella ScottJawetz GlennFranklin re Bad Lead News and change to website access to police reports	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection – hearsay FRE 801, 802 (BS)</i> <i>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 before the conspiracy alleged to have started in July 2014 and before Miller accessing from LexisNexis went interstate on approximately 2-7-2015 FRE 401,403 irrelevant and prejudicial, confusing, misleading, waste of time as this concerns separate paid-for reports regarding the Grand Rapids area, not reports accessed by Karen Miller FRE 401,403” (BS sent via 3/23/23 email)</i>	Excluded
4017L	11/28/14 email JohnCapella to ScottJawetz re Detroit DJA Leads	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection – hearsay FRE 801, 802 (BS)</i> <i>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 before Miller accessing from LexisNexis went interstate on approximately 2-7-2015, so not wire fraud, irrelevant and prejudicial FRE 401, 403 need link by link chain that the reports were sent from Karen Miller ” (BS sent via 3/23/23 email)</i>	Admissible if Government lays appropriate foundation linking leads to reports obtained by Karen Miller.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4017M	11/28/14 email John Capella to Brent Sitto re Daryl Miner UNAPPROVED REPORT	<p>-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others]</p> <p>-Relevance – FRE 401, 402 [Testimony of John Capella or others]</p>	<p>Objection – hearsay FRE 801, 802 (BS)</p> <p>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 before Miller accessing from LexisNexis went interstate on approximately 2-7-2015, so not wire fraud, irrelevant and prejudicial FRE 401, 403 need link by link chain that Daryl Miner report sent from Karen Miller” (BS sent via 3/23/23 email)</p> <p>REDACT</p>	Admissible if Government lays appropriate foundation linking report to Karen Miller.
4017M1	12/1/14 email Scott Jawetz John Capella re Daryl Miner Conf # BLC41Y (Hazel Park)	<p>-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others]</p> <p>-Relevance – FRE 401, 402 [Testimony of John Capella or others]</p>	<p>Objection – hearsay FRE 801, 802 (BS)</p> <p>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 before Miller accessing from LexisNexis went interstate on approximately 2-7-2015, so not wire fraud, irrelevant and prejudicial FRE 401, 403 need link by link chain that Daryl Miner report sent from Karen Miller” (BS sent via 3/23/23 email)</p> <p>REDACT</p>	Admissible if Government can lay proper foundation linking exhibit to reports obtained by Karen Miller.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4017N	12/2/14 email BrentSitto JohnCapella re DarylMiner UNAPPROVED REPORT_request	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	Objection – hearsay FRE 801, 802 (BS) - “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 before Miller accessing from LexisNexis went interstate on approximately 2-7-2015, so not wire fraud, irrelevant and prejudicial FRE 401, 403 need link by link chain that Daryl Miner report sent from Karen Miller” (BS sent via 3/23/23 email) REDACT	Admissible if Government can lay proper foundation linking exhibit to reports obtained by Karen Miller.
4017O	12/2/14 email JohnCapella BrentSitto JohnCapella re DarylMiner UNAPPROVED REPORT_full report sent to Sitto	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	Objection – hearsay FRE 801, 802 (BS) - “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 before Miller accessing from LexisNexis went interstate on approximately 2-7-2015, so not wire fraud, irrelevant and prejudicial FRE 401, 403 need link by link chain that Daryl Miner report sent from Karen Miller” (BS sent via 3/23/23 email) REDACT	Admissible if Government can lay proper foundation linking exhibit to reports obtained by Karen Miller.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4017P	1/24/15 email John Capella to John Capella re Daryl Miner Request for Investigation re Attorney Grievance Commission	<p>-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others]</p> <p>-Relevance – FRE 401, 402 [Testimony of John Capella or others]</p>	<p><i>Objection – hearsay FRE 801, 802 (BS)</i></p> <p><i>- “need Certification referenced FRE 803(6), 902(11) content of attachment is inadmissible hearsay FRE 801(c), 802 before Miller accessing from LexisNexis went interstate on approximately 2-7-2015, so not wire fraud, irrelevant and prejudicial FRE 401, 403 need link by link chain that Daryl Miner report sent from Karen Miller Request for Investigation to the Attorney Grievance Commission is unduly prejudicial FRE 403, especially one that did not result in a formal (public) complaint. Mich Court R. 9.126(A) provides that such investigations are confidential and many not be made public. Further, even in cases where there is an admonition or contractual probation (see Mich. Court R. 9.114), which here there was not, such circumstances “shall be confidential.” (BS sent via 3/23/23 email)</i></p> <p>REDACT</p>	Excluded

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4017P1	1/25/15, 12/15/14, 11/28/14 emails re JohnCapella BrentSitto GlennFranklin re DarylMinor Update	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection – hearsay FRE 801, 802 (BS)</i> <i>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 before Miller accessing from LexisNexis went interstate on approximately 2-7-2015, so not wire fraud, irrelevant and prejudicial FRE 401, 403 need link by link chain that Daryl Miner report sent from Karen Miller would need redactions re “Bar Complaint against you” for reasons stated in objection to 4017P” (BS sent via 3/23/23 email)</i> REDACT	Excluded

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4017P2	1/28/15, Brent Sitto, Statement in Response to Request for Investigation	<p>-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others]</p> <p>-Relevance – FRE 401, 402 [Testimony of John Capella or others]</p>	<p><i>Objection – hearsay FRE 801, 802 (BS)</i></p> <p><i>- “before Miller accessing from LexisNexis went interstate on approximately 2-7-2015, so not wire fraud, irrelevant and prejudicial FRE 401, 403 need link by link chain that Daryl Miner report sent from Karen Miller Response to the Attorney Grievance Commission is unduly prejudicial FRE 403, especially one that did not result in a formal (public) complaint. Mich Court R. 9.126(A) provides that such investigations are confidential and many not be made public. Further, even in cases where there is an admonition or contractual probation (see Mich. Court R. 9.114), which here there was not, such circumstances “shall be confidential.”” (BS sent via 3/23/23 email)</i></p> <p>REDACT</p>	Excluded

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4017P3	<i>1/17/23 email from Michigan Attorney Grievance Commission and underlying Trial Subpoena</i>	<p>-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others]</p> <p>-Relevance – FRE 401, 402 [Testimony of John Capella or others]</p>	<p><i>Objection – hearsay FRE 801, 802 (BS)</i></p> <p><i>- “before Miller accessing from LexisNexis went interstate on approximately 2-7-2015, so not wire fraud, irrelevant and prejudicial FRE 401, 403 need link by link chain that Daryl Miner report sent from Karen Miller Response to the Attorney Grievance Commission is unduly prejudicial FRE 403, especially one that did not result in a formal (public) complaint. Mich Court R. 9.126(A) provides that such investigations are confidential and many not be made public. Further, even in cases where there is an admonition or contractual probation (see Mich. Court R. 9.114), which here there was not, such circumstances “shall be confidential.” Trial subpoena and letter from Government counsel is not evidence” (BS sent via 3/23/23 email)</i></p> <p>REDACT</p>	Excluded

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4017P4	1/28/15 Brent Sitto, Statement in Response to Request for Investigation Cover Letter Only	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection – hearsay FRE 801, 802 (BS)</i> <i>- “this document is the same first two pages of 4017P2 (see objections to 4017P2), document without the referenced attachments should not be admitted FRE 106” (BS sent via 3/23/23 email)</i>	Excluded
4017Q	7/15/15 email JohnCapella to GlennFranklin re Commercial Account Access to Accident Reports	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection – hearsay in text of email FRE 801, 802 (JA); relevance re scope/timeframe FRE 401 (BS); Objection – govt failed to fully identify the witness (BS)</i> <i>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 irrelevant and prejudicial, confusing, misleading, waste of time as this concerns separate paid-for reports, not reports from Karen Miller FRE 401,403” (BS sent via 3/23/23 email)</i>	Admitted

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4021	1/13/15 email JohnCapella ScottJawetz BrentSitto GlennFranklin JohnAngelo re unapproved report	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection -relevance, not part of the conspiracy FRE 401 (BS); hearsay in text of email FRE 801, 802 (JA)</i> - “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 before Miller accessing from LexisNexis went interstate on approximately 2-7-2015, so not wire fraud, irrelevant and prejudicial FRE 401, 403 need link by link chain that Leonard Miree report sent from Karen Miller” (BS sent via 3/23/23 email) REDACT	Admissible if Government can lay proper foundation linking exhibit to reports obtained by Karen Miller.
4022	5/28/15 email JohnCapella JohnAngelo ScottJawetz GlennFranklin re unapproved report and referral to Cozzetto at Flint location	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection - hearsay in text of email FRE 801, 802 (JA)</i> - “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 need link by link chain that Elizabeth Cosby report sent from Karen Miller” (BS sent via 3/23/23 email) REDACT	Admissible if Government can lay proper foundation linking exhibit to reports obtained by Karen Miller.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4023	4/16/15 email JohnAngelo (561-201-2115) to JohnCapella re change in Michigan solicitation laws	-Authentication - FRE 613 -Relevance – FRE 401, 402 [Testimony of Defense Witness]	<i>Objection - hearsay in text of email FRE 801, 802 (JA, BS)</i> <i>- “401, 403, 801” (JA sent via 3/21/23 email)</i> <i>- “article is hearsay and is not attached FRE 106 article is not the law and Michigan law is irrelevant and prejudicial FRE 401, 403; Court’s Order ECF # 313 at PgID.5398-99.” (BS sent via 3/23/23 email)</i>	Excluded
4023A	6/8/15 email JohnCapella to JohnAngelo re DJA referral for week	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection - hearsay in text of email FRE 801, 802 (JA, BS)</i> <i>-- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 need link by link chain that Barbara Williams report sent from Karen Miller” (BS sent via 3/23/23 email)</i> <i>REDACT</i>	No Ruling (Exhibit Withdrawn)

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4023A1	6/8/15 email JohnCapella JohnAngelo Jawetz Glenn Franklin re DJA referral for week	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>No objection</i> <i>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 need link by link chain that Barbara Williams report sent from Karen Miller” (BS sent via 3/23/23 email)</i> <i>REDACT</i>	Admissible if Government can lay proper foundation linking exhibit to reports obtained by Karen Miller.
4023B	4/20/15 email JohnCapella to JohnAngelo re DJA referral for week	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection – relevance FRE 401 (JA); hearsay in text of email FRE 801, 802 (JA, BS)</i> <i>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 need link by link chain that Cherish Walker report sent from Karen Miller” (BS sent via 3/23/23 email)</i> <i>REDACT</i>	Admissible if Government can lay proper foundation linking exhibit to reports obtained by Karen Miller.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4023B1	4/20/15 email JohnCapella JohnAngelo BrentSitto ScottJAwetz re DJA referral for week	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection – relevance FRE 401 (JA); hearsay in text of email FRE 801, 802 (JA, BS)</i> <i>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 need link by link chain that Cherish Walker report sent from Karen Miller” (BS sent via 3/23/23 email)</i> REDACT	Admissible if Government can lay proper foundation linking exhibit to reports obtained by Karen Miller.
4023C	4/27/15 email JohnCapella to JohnAngelo re DJA referral for week	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection – relevance FRE 401 (JA); hearsay in text of email FRE 801, 802 (JA, BS)</i> <i>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 need link by link chain that Erin Jones report sent from Karen Miller” (BS sent via 3/23/23 email)</i> REDACT	Admissible if Government can lay proper foundation linking exhibit to reports obtained by Karen Miller.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4023C1	4/27/2015 email JohnCapella JohnAngelo ScottJawetz BrentSitto re DJA referral	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection – relevance FRE 401 (JA); hearsay in text of email FRE 801, 802 (JA, BS)</i> <i>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 need link by link chain that Erin Jones report sent from Karen Miller” (BS sent via 3/23/23 email)</i> REDACT	Admissible if Government can lay proper foundation linking exhibit to reports obtained by Karen Miller.
4023D	5/6/15 email JohnCapella to JohnAngelo re DJA referral for week	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection – relevance FRE 401 (JA); hearsay in text of email FRE 801, 802 (JA, BS)</i> <i>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 need link by link chain that Tyree Kirkland report sent from Karen Miller” (BS sent via 3/23/23 email)</i> REDACT	Admissible if Government can lay proper foundation linking exhibit to reports obtained by Karen Miller.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4023D1	5/6/15 email JohnCapella to JohnAngelo re DJA referral for week	<p>-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others]</p> <p>-Relevance – FRE 401, 402 [Testimony of John Capella or others]</p>	<p><i>Objection – relevance FRE 401 (JA); hearsay in text of email FRE 801, 802 (JA, BS)</i></p> <p><i>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 need link by link chain that Tyree Kirkland report sent from Karen Miller” (BS sent via 3/23/23 email)</i></p> <p>REDACT</p>	Admissible if Government can lay proper foundation linking exhibit to reports obtained by Karen Miller.
4023E	5/12/15 email JohnCapella to JohnAngelo re DJA referral for week	<p>-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others]</p> <p>-Relevance – FRE 401, 402 [Testimony of John Capella or others]</p>	<p><i>Objection – relevance FRE 401 (JA); hearsay in text of email FRE 801, 802 (JA, BS)</i></p> <p><i>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 need link by link chain that Miranda King report sent from Karen Miller” (BS sent via 3/23/23 email)</i></p> <p>REDACT</p>	Admissible if Government can lay proper foundation linking exhibit to reports obtained by Karen Miller.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4023E1	5/12/15 email JohnCapella JohnAngelo GlennFranklin Jawetz re DJA referral for week	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection – relevance FRE 401 (JA); hearsay in text of email FRE 801, 802 (JA, BS)</i> <i>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 need link by link chain that Miranda King report sent from Karen Miller” (BS sent via 3/23/23 email)</i> REDACT	Admissible if Government can lay proper foundation linking exhibit to reports obtained by Karen Miller.
4023E2	5/12/15 email JohnCapella ScottJawetz GlennFranklin BrentSitto re intake question	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection – relevance FRE 401 (JA); hearsay in text of email FRE 801, 802 (JA, BS)</i> <i>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 need link by link chain that Oneal Jennings report sent from Karen Miller” (BS sent via 3/23/23 email)</i> REDACT	Admissible if Government can lay proper foundation linking exhibit to reports obtained by Karen Miller.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4023E3	5/12/15 email JohnCapella ScottJawetz re intake question	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection – relevance FRE 401 (JA); hearsay in text of email FRE 801, 802 (JA, BS)</i> <i>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 need link by link chain that Oneal Jennings report sent from Karen Miller” (BS sent via 3/23/23 email)</i> REDACT	Admissible if Government can lay proper foundation linking exhibit to reports obtained by Karen Miller.
4024	7/16/15 email JohnCapella ScottJawetz BrentSitto GlennFranklin JohnAngelo re unapproved report	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection – relevance FRE 401 (JA); hearsay in text of email FRE 801, 802 (JA, BS)</i> <i>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 need link by link chain that Thompson Gilbert report sent from Karen Miller” (BS sent via 3/23/23 email)</i> REDACT	Admissible if Government can lay proper foundation linking exhibit to reports obtained by Karen Miller.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
4026	9/21/15 email JohnCapella ScottJawetz BrentSitto GlennFranklin JohnAngelo re unapproved report	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection – relevance FRE 401 (JA); hearsay in text of email FRE 801, 802 (JA, BS)</i> <i>- “need Certification referenced FRE 803(6), 902(11) content of email is inadmissible hearsay FRE 801(c), 802 need link by link chain that Samantha Vanegas report sent from Karen Miller” (BS sent via 3/23/23 email)</i> REDACT	Admissible if Government can lay proper foundation linking exhibit to reports obtained by Karen Miller.
7001	Mann Global Comerica acct7086 signature card re CM	-Authentication - FRE 803(6), 902(11) [Certification] 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of Bryan Kearis or others] -Relevance – FRE 401, 402 [Testimony of Bryan Kearis or others]	<i>Objection – foundation through witness Kearis or Yenglin FRE 401, 402 (CM)</i>	Admissible if Government can lay proper foundation.
7002	Gravity Imaging JP Morgan Chase acct3377 acct2312, signature card, statements, checks - September 2015 to June 2022	-Authentication - FRE 803(6), 902(11) [Certification] 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of Bryan Kearis or others] -Relevance – FRE 401, 402 [Testimony of Bryan Kearis or others]	<i>Objection – foundation through witness Kearis or Yenglin FRE 401, 402 (CM)</i>	Admissible if Government can lay proper foundation.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
7002B	Gravity Imaging JanDec 2018 General Ledger	-Authentication - FRE 803(6), 902(11) [Testimony of Kevin Yenglin] 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of Bryan Kearis or others] -Relevance FRE 401, 402 [Testimony of Bryan Kearis or others]	<i>Objection – foundation through witness Kearis or Yenglin FRE 401, 402 (CM)</i>	Admissible if Government can lay proper foundation.
7002C	Gravity Imaging JunDec 2018 General Ledger	-Authentication - FRE 803(6), 902(11) [Testimony of Kevin Yenglin] 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of Bryan Kearis or others] -Relevance FRE 401, 402 [Testimony of Bryan Kearis or others]	<i>Objection – foundation through witness Kearis or Yenglin FRE 401, 402 (CM)</i>	Admissible if Government can lay proper foundation.
7002D	Gravity Imaging JanDec 2017 General Ledger	-Authentication - FRE 803(6), 902(11) [Certification] 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of Bryan Kearis or others] -Relevance FRE 401, 402 [Testimony of Bryan Kearis or others]	<i>Objection – foundation through witness Kearis or Yenglin FRE 401, 402 (CM)</i>	Admissible if Government can lay proper foundation.
7002E	Gravity Imaging JanDec 2016 General Ledger	-Authentication - FRE 803(6), 902(11) [Certification] 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of Bryan Kearis or others] -Relevance FRE 401, 402 [Testimony of Bryan Kearis or others]	<i>Objection – foundation through witness Kearis or Yenglin FRE 401, 402 (CM)</i>	Admissible if Government can lay proper foundation.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
7002W1	4/20/15 email JaredMaynard CoryMann ReniGeorge re fee	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of Jared Maynard or others] -Relevance – FRE 401, 402 [Testimony of Jared Maynard or others]	<i>Objection – relevance, FRE 401 (CM); probative substantially outweighs prejudicial FRE 403 (CM)</i>	Excluded
7002W2	5/1/15 email CoryMann MRadom DBittner JaysonRosett MMorse MMeeron re Michigan No Fault Insurance	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of Jayson Rosett or others] -Relevance – FRE 401, 402 [Testimony of Jayson Rosett or others]	<i>Objection – relevance, FRE 401 (CM); probative substantially outweighs prejudicial FRE 403 (CM)</i>	No Ruling (Exhibit Withdrawn)
7002W3	5/11/15 email JaredMaynard CoryMann re new legislation proposal	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of Jared Maynard or others] -Relevance – FRE 401, 402 [Testimony of Jared Maynard or others]	<i>Objection – relevance, FRE 401 (CM); probative substantially outweighs prejudicial FRE 403 (CM)</i>	No Ruling (Exhibit Withdrawn)
7002X	Checks to Jared Maynard 2015 to 2019	-Authentication - FRE 803(6), 902(11) [Certification] 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of Jared Maynard or others] -Relevance – FRE 401, 402 [Testimony of Jared Maynard or others]	<i>Objection – relevance, FRE 401 (CM); probative substantially outweighs prejudicial FRE 403 (CM)</i>	No Ruling (Exhibit Withdrawn)

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
7002Y	Engtechnik documents re Gravity Imaging and Shin Nippon Machinery Co LTD in 2019	-Authentication - FRE 803(6), 902(11) [Certification] 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of Bryan Kearis or others] -Relevance – FRE 401, 402 [Testimony of Bryan Kearis or others]	<i>Objection – relevance, FRE 401 (CM); probative substantially outweighs prejudicial FRE 403 (CM)</i>	No Ruling (Exhibit Withdrawn)
7002Z	Wesley Green documents re Gravity Imaging and Shin Nippon Machinery Co LTD in 2019	-Authentication - FRE 803(6), 902(11) [Certification] 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of Bryan Kearis or others] -Relevance – FRE 401, 402 [Testimony of Bryan Kearis or others]	<i>Objection – relevance, FRE 401 (CM); probative substantially outweighs prejudicial FRE 403 (CM)</i>	No Ruling (Exhibit Withdrawn)
7003	[currently withdrawn from consideration]	-Authentication - FRE 613 -Relevance – FRE 401, 402 [Testimony of Defense Witness]		No Ruling (Exhibit Withdrawn)
7004	6/30/13 email CoryMann to JohnCapella re BlueHorseshoue Consulting represents to victims they are a nonprofit	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection - relevance re scope/timeframe FRE 401 (JA, CM, BS); hearsay FRE 801, 802 (JA, CM, BS)</i>	Court to revisit admissibility at time of trial.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
7005	6/18/13 email CoryMann to DavidKatz ScottZack JohnCapella re clients to chiropractors	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection - relevance re scope/timeframe FRE 401 (JA, CM, BS); hearsay FRE 801, 802 (JA, CM, BS)</i> <i>- “FRE 403” (BS sent via 3/23/23 email)</i>	Excluded
7006	6/18/13 email CoryMann JohnCapella re dispute	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection - relevance re scope/timeframe FRE 401 (JA, CM, BS); hearsay FRE 801, 802 (JA, CM, BS)</i>	Excluded
7007	6/18/13 email CoryMann JohnCapella re solicitation work	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection - relevance re scope/timeframe FRE 401 (JA, CM, BS); hearsay FRE 801, 802 (JA, CM, BS)</i>	Excluded
7008	6/3/13 email CoryMann to JohnCapella re help to develop arguments against new MI solicitation laws	-Authentication - FRE 613 -Relevance – FRE 401, 402 [Testimony of Defense Witness]	<i>Objection - relevance re scope/timeframe FRE 401 (JA, CM, BS); hearsay FRE 801, 802 (JA, CM, BS)</i>	Excluded

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
7009	5/30/13 email CoryMann to JohnCapella re help to develop arguments against new MI solicitation laws	-Authentication - FRE 613 -Relevance – FRE 401, 402 [Testimony of Defense Witness]	<i>Objection - relevance re scope/timeframe FRE 401 (JA, CM, BS); hearsay FRE 801, 802 (JA, CM, BS)</i> <i>- “unknown person’s summary of potential future legislation that was forwarded is not the law and Michigan law is irrelevant and prejudicial FRE 401, 403; Court’s Order ECF #313 at PgID.5398-99.” (BS sent via 3/23/23 email)</i>	Excluded
7010	4/10/13 email CoryMann DavidKatz ScottZack DaleKatz ScottJawetz re CoryMann review of solicitation data	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection - relevance re scope/timeframe FRE 401 (JA, CM, BS); hearsay FRE 801, 802 (JA, CM, BS)</i>	Excluded
7011	3/20/13 email CoryMann JohnCapella fwd article on MI prescription fraud	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection - relevance re scope/timeframe FRE 401 (JA, CM, BS); hearsay FRE 801, 802 (JA, CM, BS)</i> <i>- “article not attached FRE 106” (BS sent via 3/23/23 email)</i>	Excluded

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
8001	Google subscriber information re injuryhealth@gmail.com (Daneshvar) re phone contact 248-444-2634 and recovery email advclinic@yahoo.com	-Authentication - FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – relevance FRE 401 (MD); foundation through witness Sereno FRE 401, 402 (MD)</i>	Admitted
8002	SMS Messages 2/14/17 @ i) 10:25:09 ii) 10:26:05, iii) 10:26:11 between 248-444-2634/ MichaelDaneshvar and 908-358-9311/JohnAngelo	-Authentication -FRE 901(a), 901(b)(1), (b)(4) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – hearsay FRE 801, 802 (JA, MD)</i>	Admitted in format and with redactions discussed on the record (the “Agreed Format”).
8003	[currently withdrawn from consideration]	-Authentication -FRE 803(6)(A)-(C) [Certification]/ FRE 901(a), 901(b)(1), (b)(4) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]		Admissible in the Agreed Format.
8003A	SMS 1/9/17 @ 15:49:15 from 248-444-2634/ MichaelDaneshvar to 908-358-9311/JohnAngelo	-Authentication -FRE 901(a), 901(b)(1), (b)(4) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – hearsay FRE 801, 802 (JA, MD); foundation through witness Sereno FRE 401, 402 (MD); format of exhibit (JA)</i>	Admissible in the Agreed Format.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
8003B	SMS 1/9/17 @ 17:36:05 from 908-358-9311/JohnAngelo to 248-444-2634/ MichaelDaneshvar	-Authentication -FRE 901(a), 901(b)(1), (b)(4) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – hearsay FRE 801, 802 (JA, MD); foundation through witness Sereno FRE 401, 402 (MD); format of exhibit (JA)</i>	Admissible in the Agreed Format.
8003C	SMS 1/9/17 @ 17:39:17 from 248-444-2634/ MichaelDaneshvar to 908-358-9311/JohnAngelo	-Authentication -FRE 901(a), 901(b)(1), (b)(4) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – hearsay FRE 801, 802 (JA, MD); foundation through witness Sereno FRE 401, 402 (MD); format of exhibit (JA)</i>	Admissible in the Agreed Format.
8003C1	call 1/10/17 @ 10:57:44 from 908-358-9311/JohnAngelo to 248-953-2475/ AnthonySereno	-Authentication -FRE 901(a), 901(b)(1), (b)(4), (b)(5), (b)(6) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – hearsay FRE 801, 802 (JA, MD); format of exhibit (JA)</i>	Excluded
8003C2	call 1/10/17 @ 10:06:10 from 248-910-4455/Cory Mann to 908-358-9311/John Angelo_AUDIO	-Authentication -FRE 901(a), 901(b)(1), (b)(4), (b)(5), (b)(6) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – hearsay FRE 801, 802 (JA); format of exhibit (JA)</i>	Court to revisit admissibility at time of trial. Before offering into evidence, Government shall put exhibit into the Agreed Format.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
8003C2A	call 1/10/17 @ 10:06:10 from 248-910-4455/Cory Mann to 908-358-9311/John Angelo_	-Authentication -FRE 901(a), 901(b)(1), (b)(4), (b)(5), (b)(6) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – hearsay FRE 801, 802 (JA, MD); format of exhibit (JA)</i>	Court to revisit admissibility at time of trial.
8003D	SMS 1/12/17 @ 10:42:22 from 248-444-2634/ MichaelDaneshvar to 908-358-9311/JohnAngelo	-Authentication -FRE 901(a), 901(b)(1), (b)(4) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – hearsay FRE 801, 802 (JA, MD); format of exhibit (JA)</i>	Admissible in the Agreed Format
8003D1	call 1/13/17 @ 16:31:24 from 248-953-2475/ AnthonySereno to 908-358-9311/JohnAngelo	-Authentication -FRE 901(a), 901(b)(1), (b)(4), (b)(5), (b)(6) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – hearsay FRE 801, 802 (JA); format of exhibit (JA)</i>	Parties to meet and confer about potential redactions. Court to revisit admissibility at time of trial. Before offering into evidence, Government shall put exhibit into the Agreed Format.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
8003D2	SMS 1/16/17 between 248-910-4455/CoryMann to 908-358-9311/JohnAngelo	-Authentication -FRE 901(a), 901(b)(1), (b)(4) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – relevance FRE 410 (JA, CM); hearsay FRE 801, 802 (JA, CM); format of exhibit (JA)</i>	Excluded
8003E	SMS 1/24/17 @ 11:13:15 from 248-444-2634/ MichaelDaneshvar to 908-358-9311/JohnAngelo	-Authentication -FRE 901(a), 901(b)(1), (b)(4) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – hearsay FRE 801, 802 (JA, MD); foundation through witness Sereno FRE 401, 402 (MD); format of exhibit (JA)</i>	Admissible in the Agreed Format.
8003F	SMS 1/24/17 @ 11:14:26 from 908-358-9311/JohnAngelo to 248-444-2634/ MichaelDaneshvar	-Authentication -FRE 901(a), 901(b)(1), (b)(4) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – hearsay FRE 801, 802 (JA, MD); foundation through witness Sereno FRE 401, 402 (MD); format of exhibit (JA)</i>	Admissible in the Agreed Format.
8003F1	Call 1/26/17 @ 11:37:44 from 908-358-9311/JohnAngelo to 248-444-2634/ MichaelDaneshvar	-Authentication -FRE 901(a), 901(b)(1), (b)(4), (b)(5), (b)(6) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – hearsay FRE 801, 802 (JA, MD); foundation through witness Sereno FRE 401, 402 (MD); format of exhibit (JA)</i>	Admissible in the Agreed Format.
8003G	SMS 1/26/17 @ 13:10:00 from 248-444-2634/ MichaelDaneshvar to 908-358-9311/JohnAngelo	-Authentication -FRE 901(a), 901(b)(1), (b)(4) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – hearsay FRE 801, 802 (JA, MD); foundation through witness Sereno FRE 401, 402 (MD); format of exhibit (JA)</i>	Admissible in the Agreed Format.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
8003H	SMS 1/26/17 @ 13:10:50 from 908-358-9311/JohnAngelo to 248-444-2634/ MichaelDaneshvar	-Authentication -FRE 901(a), 901(b)(1), (b)(4) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – hearsay FRE 801, 802 (JA, MD); foundation through witness Sereno FRE 401, 402 (MD); format of exhibit (JA)</i>	Admissible in the Agreed Format.
8003H1	call 1/26/17 @ 13:10:54 from 908-358-9311/JohnAngelo to 248-953-2475/ AnthonySereno	-Authentication -FRE 901(a), 901(b)(1), (b)(4), (b)(5), (b)(6) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – hearsay FRE 801, 802 (JA, MD); foundation through witness Sereno FRE 401, 402 (MD); format of exhibit (JA)</i>	Court will revisit admissibility at time of trial. Government must lay proper foundation.
8003I	call 1/26/17 @ 14:10:26 from 248-953-2475/ AnthonySereno to 908-358-9311/JohnAngelo	-Authentication -FRE 901(a), 901(b)(1), (b)(4), (b)(5), (b)(6) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – hearsay FRE 801, 802 (JA); format of exhibit (JA)</i>	Court will revisit admissibility at time of trial. Government must lay proper foundation.
8003J	call 1/26/17 @ 14:52:13 from 908-358-9311/JohnAngelo to 248-953-2475/ AnthonySereno	-Authentication -FRE 901(a), 901(b)(1), (b)(4), (b)(5), (b)(6) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – hearsay FRE 801, 802 (JA); format of exhibit (JA)</i>	Court will revisit admissibility at time of trial. Government must lay proper foundation.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
8003K	call 1/26/17 @ 16:19:22 from 973-941-8955/ RosinaAngelo to 908-358-9311/JohnAngelo	-Authentication -FRE 901(a), 901(b)(1), (b)(4), (b)(5), (b)(6) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – hearsay FRE 801, 802 (JA); format of exhibit (JA)</i>	No Ruling (Exhibit Withdrawn)
8003L	SMS 1/26/17 @ 17:12:17 from 248-910-4455/CoryMann to 908-358-9311/JohnAngelo	-Authentication -FRE 901(a), 901(b)(1), (b)(4) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – hearsay FRE 801, 802 (JA, MD); foundation through witness Sereno FRE 401, 402 (MD); format of exhibit (JA)</i>	Excluded
8003M	SMS 1/26/17 @ 17:13:11 from 908-358-9311/JohnAngelo to 248-910-4455/CoryMann	-Authentication -FRE 901(a), 901(b)(1), (b)(4) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – hearsay FRE 801, 802 (JA, MD); foundation through witness Sereno FRE 401, 402 (MD); format of exhibit (JA)</i>	Excluded
8003N	SMS 1/26/17 @ 17:13:35 from 248-910-4455/CoryMann to 908-358-9311/JohnAngelo	-Authentication -FRE 901(a), 901(b)(1), (b)(4) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – hearsay FRE 801, 802 (JA, MD); foundation through witness Sereno FRE 401, 402 (MD); format of exhibit (JA)</i>	Excluded
8003O	SMS 1/26/17 @ 17:14:15 from 908-358-9311/JohnAngelo to 248-910-4455/CoryMann	-Authentication -FRE 901(a), 901(b)(1), (b)(4) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – hearsay FRE 801, 802 (JA, MD); foundation through witness Sereno FRE 401, 402 (MD); format of exhibit (JA)</i>	Excluded

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
8004A	call 1/12/17 @ 10:47:46 from 248-953-2475/ AnthonySereno to 908-358-9311/JohnAngelo AUDIO	-Authentication -FRE 901(a), 901(b)(1), (b)(4), (b)(5), (b)(6) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – hearsay FRE 801, 802 (JA); format of exhibit (JA)</i>	No Ruling (Exhibit Withdrawn)
8004A1	call 1/12/17 @ 10:47:46 from 248-953-2475/ AnthonySereno to 908-358-9311/JohnAngelo	-Authentication -FRE 901(a), 901(b)(1), (b)(4), (b)(5), (b)(6) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – hearsay FRE 801, 802 (JA); format of exhibit (JA)</i>	No Ruling (Exhibit Withdrawn)
8005	JaysonRosett/ Robert Rosett use of yy1745mp_gmail_com_email address	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of Jayson Rosett or others] -Relevance – FRE 401, 402 [Testimony of Jayson Rosett or others]	<i>No objection</i>	Admitted (No Objections)
8005A1	1/16/17 email KarenMiller to JaysonRosett RobertRosett re bundle of 19 DPD crash reports (incl. ExternalID_110 0272)	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of Jayson Rosett or others] -Relevance – FRE 401, 402 [Testimony of Jayson Rosett or others]	<i>No objection</i>	Admitted (No Objections)

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
8005A2	1/16/17 email JaysonRosett RobertRosett to JohnAngelo re bundle of 19 DPD crash reports (incl. ExternalID_110 0272)	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of Jayson Rosett or others] -Relevance – FRE 401, 402 [Testimony of Jayson Rosett or others]	<i>No objection</i>	Admitted (No Objections)
8005A3	1/16/17 email JaysonRosett RobertRosett to JohnAngelo re bundle of 19 DPD crash reports (incl. ExternalID_110 0272)	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of Jayson Rosett or others] -Relevance – FRE 401, 402 [Testimony of Jayson Rosett or others]	<i>No objection</i>	Admitted (No Objections)
8005A4	1/16/17 email JaysonRosett RobertRosett to JohnAngelo re bundle of 19 DPD crash reports (incl. ExternalID_110 0272)	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of Jayson Rosett or others] -Relevance – FRE 401, 402 [Testimony of Jayson Rosett or others]	<i>No objection</i>	Admitted (No Objections)
8005A5	1/16/17 email JohnAngelo to MichaelDaneshvar re bundle of 19 DPD crash reports (incl. ExternalID_110 0272)	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>No objection</i>	Admitted (No Objections)

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
8005A6	1/31/17 email M_Awaisi to JohnAngelo re R_Jeremiah MRI referral to Gravity Imaging	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	No objection	Admitted (No Objections)
8005A7	1/31/17 email to JohnAngelo re R_Jeremiah MRI referral to Gravity Imaging_	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	No objection	Admitted (No Objections)
8006	call 1/26/17 @ 16:19:22 from 973-941-8955/ RosinaAngelo to 908-358-9311/ JohnAngelo	-Authentication -FRE 901(a), 901(b)(1), (b)(4), (b)(5), (b)(6) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	Objection – hearsay FRE 801, 802 (JA)	Court to revisit admissibility at time of trial. Government must lay proper foundation.
8007	call 2/10/17 @ 15:56:59 from 248-444-2634/ MichaelDaneshvar to 908-358-9311/JohnAngelo	-Authentication -FRE 901(a), 901(b)(1), (b)(4), (b)(5), (b)(6) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	Objection – hearsay FRE 801, 802 (JA); foundation through witness Sereno FRE 401, 402 (MD); format of exhibit (JA)	Court to revisit admissibility at time of trial. Government must lay proper foundation.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
8007A	call 2/10/17 @ 12:22:35 from 248-953-2475/ AnthonySereno to 908-358-9311/JohnAngelo	-Authentication -FRE 901(a), 901(b)(1), (b)(4), (b)(5), (b)(6) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – hearsay FRE 801, 802 (JA); format of exhibit (JA)</i>	Court to revisit admissibility at time of trial. Government must lay proper foundation.
8007B	call 2/10/17 @ 16:32:47 from 908-358-9311/JohnAngelo to 248-953-2475/ AnthonySereno	-Authentication -FRE 901(a), 901(b)(1), (b)(4), (b)(5), (b)(6) [Testimony of Special Agent, Anthony Sereno or others] -Relevance – FRE 401, 402 [Testimony of Anthony Sereno or others]	<i>Objection – hearsay FRE 801, 802 (JA); format of exhibit (JA)</i>	Court to revisit admissibility at time of trial. Government must lay proper foundation.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
8008	email 2/25/14 patientdispatch@gmail.com (Daneshvar) to ScottJawetz JohnCapella re SCI sending \$13,400	<p>-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others]</p> <p>-Relevance – FRE 401, 402 [Testimony of John Capella or others]</p>	<p><i>Objection – hearsay FRE 801, 802 (JA, MD)</i></p> <p><i>- “need the Certification if there is one FRE 902(11), (13) content of email is inadmissible hearsay FRE 801(c), 802 before the conspiracy alleged to have started in July 2014 and before Miller accessing from LexisNexis went interstate on approximately 2-7-2015 FRE 401,403 irrelevant and prejudicial, confusing, misleading, waste of time as this would concern separate paid-for reports, not any report accessed by Karen Miller and sent down a chain to Capella FRE 401,403” (BS sent via 3/23/23 email)</i></p>	Excluded

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
8009	email 3/5/14 ScottJawetz JohnCapella re Daneshvar StandardCare and BrentSitto with Standard Care PNC Bank acct8617 check no. 1021 for \$5,000 payable to Blue Horseshoe	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection - relevance re scope/timeframe FRE401 (JA, MD, BS) - “need the Certification if there is one FRE 902(11), (13) before the conspiracy alleged to have started in July 2014 and before Miller accessing from LexisNexis went interstate on approximately 2-7-2015 FRE 401,403 irrelevant and prejudicial, confusing, misleading, waste of time as this would concern separate paid-for reports, not any report accessed by Karen Miller and sent down a chain to Capella FRE 401,403” (BS sent via 3/23/23 email)</i>	Excluded

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
8010	email 7/30/14 patientdispatch@gmail.com (Daneshvar) JohnCapella standardsmeds@yahoo.com (Daneshvar)re "Don't Use Commendation Transportation"	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection – hearsay FRE 801, 802 (JA, MD)</i> <i>- “need the Certification if there is one FRE 902(11), (13) content of email is inadmissible hearsay FRE 801(c), 802 before the conspiracy alleged to have started in July 2014 and before Miller accessing from LexisNexis went interstate on approximately 2-7-2015 FRE 401,403 irrelevant and prejudicial, confusing, misleading, waste of time as this would concern separate paid-for reports, not any report accessed by Karen Miller and sent down a chain to Capella FRE 401,403” (BS sent via 3/23/23 email)</i>	Excluded

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
8011	email 8/14/14 JohnCapella advclinic@yahoo.com (Daneshvar) Scott Jawetz re proposal	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection – hearsay FRE 801, 802 (JA, MD, BS); relevance re scope/timeframe FRE 401 (JA, MD, BS), inflammatory language needs redaction – govt agrees to redact..(BS)</i> <i>- “need the Certification if there is one FRE 902(11), (13)content of email is inadmissible hearsay FRE 801(c), 802before Miller accessing from LexisNexis went interstate on approximately 2-7-2015 FRE 401,403” (BS sent via 3/23/23 email)</i>	Excluded

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
8012	2/25/15 email JohnCapella standardsmeds@yahoo.com (Daneshvar) re business dispute	<p>-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others]</p> <p>-Relevance – FRE 401, 402 [Testimony of John Capella or others]</p>	<p><i>Objection – hearsay FRE 801, 802 (JA, MD, BS); relevance re scope/timeframe FRE 401 (JA, MD, BS), inflammatory language needs redaction – govt agrees to redact..(BS)</i></p> <p><i>- “need the Certification if there is one FRE 902(11), (13)content of email is inadmissible hearsay FRE 801(c), 802 before the conspiracy alleged to have started in July 2014 and before Miller accessing from LexisNexis went interstate on approximately 2-7-2015 FRE 401,403 irrelevant and prejudicial, confusing, misleading, waste of time as this would concern separate paid-for reports, not any report accessed by Karen Miller and sent down a chain to Capella FRE 401,403” (BS sent via 3/23/23 email)</i></p>	Excluded

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
8013	3/18/15 email JohnCapella GlennFranklin BrentSitto DavidKatz DlaeKatz MariaDuPuis re Fat Mike Update 3-18-15	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection – hearsay FRE 801, 802 (JA, BS); relevance re scope/timeframe FRE 401 (JA, BS), inflammatory language needs redaction – govt agrees to redact..(BS)</i> <i>- “need the Certification if there is one FRE 902(11), (13) content of email is inadmissible hearsay FRE 801(c), 802 would also need redactions (e.g. “Mafia Murder Threats” paragraph” (BS sent via 3/23/23 email)</i> <i>REDACT</i>	Excluded
8014	4/9/15 @ 15:47:29 email JohnCapella ScottJawetz KennyMoz BrentSitto GlennFranklin JospehRuefiel DavidKatz JohnAngelo TracyVarjabedian, etc. re business dispute with Varjabedian, Standard Care and Great Lakes	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of John Capella or others] -Relevance – FRE 401, 402 [Testimony of John Capella or others]	<i>Objection – hearsay FRE 8401, 802 (JA, BS)</i> <i>- “need the Certification if there is one FRE 902(11), (13) content of email is inadmissible hearsay FRE 801(c), 802 would also need redactions” (BS sent via 3/23/23 email)</i>	Excluded

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
8014A	4/9/15 @ 16:55:43 email JohnCapella ScottJawetz KennyMoz BrentSitto GlennFranklin JospehRuefiel DavidKatz JohnAngelo TracyVarjabedian, etc. re business dispute with Varjabedian, Standard Care and Great Lakes	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of Tracy Varjabedian or others] -Relevance – FRE 401, 402 [Testimony of Tracy Varjabedian or others]	<i>Objection – hearsay FRE 801, 802 (JA, BS)</i> - “need the Certification if there is one FRE 902(11), (13) content of email is inadmissible hearsay FRE 801(c), 802 would also need redactions” (BS sent via 3/23/23 email)	Excluded
8015	1/25/17 email JohnAngelo to Daneshvar re unapproved reports	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of Tracy Varjabedian or others] -Relevance – FRE 401, 402 [Testimony of Tracy Varjabedian or others]	<i>Objection – hearsay FRE 801, 802 (MD)</i>	Admissible if Government lays proper foundation.
8015A	1/25/17 email KarenMiller to airosetti@gmail.com re unapproved reports	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of Karen Miller or others] -Relevance – FRE 401, 402 [Testimony of Karen Miller or others]	<i>No objection</i>	Admitted (No Objections)
8015B	1/25/17 email yy1745mp@gmail.com to JohnAngelo re unapproved reports	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of Jayson Rosett or others] -Relevance – FRE 401, 402 [Testimony of Jayson Rosett or others]	<i>No objection</i>	Admitted (No Objections)

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
8015C	LNCS 014 Excel	Authentication - FRE 803(6)(A)-(C) /FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of LexisNexis Doc Custodian or others] -Relevance – FRE 401, 402 [Testimony of LexisNexis Doc Custodian or others]	<i>Objection – govt failed to fully identify the witness (BS)</i>	Admissible if Government lays proper foundation and identifies proper witness.
8015D	LNCS 014 PDF	Authentication - FRE 803(6)(A)-(C) /FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of LexisNexis Doc Custodian or others] -Relevance – FRE 401, 402 [Testimony of LexisNexis Doc Custodian or others]	<i>Objection – govt failed to fully identify the witness (BS)</i>	Admissible if Government lays proper foundation and identifies proper witness.
8015E	LNCS 031 LEMOS - 1090692 PDF	Authentication - FRE 803(6)(A)-(C) /FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of LexisNexis Doc Custodian or others] -Relevance – FRE 401, 402 [Testimony of LexisNexis Doc Custodian or others]	<i>Objection – govt failed to fully identify the witness (BS)</i>	Admissible if Government lays proper foundation and identifies proper witness.
8015F	LNCS 031 LEMOS - 1090692 Excel	Authentication - FRE 803(6)(A)-(C) /FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of LexisNexis Doc Custodian or others] -Relevance – FRE 401, 402 [Testimony of LexisNexis Doc Custodian or others]	<i>Objection – govt failed to fully identify the witness (BS)</i>	Admissible if Government lays proper foundation and identifies proper witness.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
8015G	LNCS 032 KHAN - 1163862 PDF	Authentication - FRE 803(6)(A)-(C) /FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of LexisNexis Doc Custodian or others] -Relevance – FRE 401, 402 [Testimony of LexisNexis Doc Custodian or others]	<i>Objection – govt failed to fully identify the witness (BS)</i>	Admissible if Government lays proper foundation and identifies proper witness.
8015H	LNCS 032 KHAN - 1163862 Excel	Authentication - FRE 803(6)(A)-(C) /FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of LexisNexis Doc Custodian or others] -Relevance – FRE 401, 402 [Testimony of LexisNexis Doc Custodian or others]	<i>Objection – govt failed to fully identify the witness (BS)</i>	Admissible if Government lays proper foundation and identifies proper witness.
8015I	LNCS 033 TRANSON - 1176661 PDF	Authentication - FRE 803(6)(A)-(C) /FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of LexisNexis Doc Custodian or others] -Relevance – FRE 401, 402 [Testimony of LexisNexis Doc Custodian or others]	<i>Objection – govt failed to fully identify the witness (BS)</i>	Admissible if Government lays proper foundation and identifies proper witness.
8015J	LNCS 033 TRANSON - 1176661 Excel	Authentication - FRE 803(6)(A)-(C) /FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of LexisNexis Doc Custodian or others] -Relevance – FRE 401, 402 [Testimony of LexisNexis Doc Custodian or others]	<i>Objection – govt failed to fully identify the witness (BS)</i>	Admissible if Government lays proper foundation and identifies proper witness.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
8016	1/26/17 email JohnAngelo to Daneshvar re unapproved reports	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of Jayson Rosett or others] -Relevance – FRE 401, 402 [Testimony of Jayson Rosett or others]	<i>Objection -hearsay FRE 801, 802 (MD)</i>	Admissible if Government lays proper foundation and identifies proper witness.
8016A	1/26/17 email KarenMiller to airosseti@gmail.com re unapproved reports	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of Karen Miller or others] -Relevance – FRE 401, 402 [Testimony of Karen Miller or others]	<i>No objection</i>	Admitted (No Objections)
8016B	1/26/17 email yy1745mp@gmail.com to JohnAngelo re unapproved reports	-Authentication - FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of Jayson Rosett or others] -Relevance – FRE 401, 402 [Testimony of Jayson Rosett or others]	<i>No objection</i>	Admitted (No Objections)
8016C	LNCS 012 DPD Report Views Excel	Authentication - FRE 803(6)(A)-(C) /FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of LexisNexis Doc Custodian or others] -Relevance – FRE 401, 402 [Testimony of LexisNexis Doc Custodian or others]	<i>Objection – govt failed to fully identify the witness (BS)</i>	Admissible if Government lays proper foundation and identifies proper witness.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
8016D	LNCS 012 DPD Report Views PDF	Authentication - FRE 803(6)(A)-(C) /FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of LexisNexis Doc Custodian or others] -Relevance – FRE 401, 402 [Testimony of LexisNexis Doc Custodian or others]	<i>Objection – govt failed to fully identify the witness (BS)</i>	Admissible if Government lays proper foundation and identifies proper witness.
8016E	LNCS 013 DetroitPolice_R eports_viewed Excel	Authentication - FRE 803(6)(A)-(C) /FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of LexisNexis Doc Custodian or others] -Relevance – FRE 401, 402 [Testimony of LexisNexis Doc Custodian or others]	<i>Objection – govt failed to fully identify the witness (BS)</i>	Admissible if Government lays proper foundation and identifies proper witness.
8016F	LNCS 013 DetroitPolice_R eports_viewed PDF	Authentication - FRE 803(6)(A)-(C) /FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of LexisNexis Doc Custodian or others] -Relevance – FRE 401, 402 [Testimony of LexisNexis Doc Custodian or others]	<i>Objection – govt failed to fully identify the witness (BS)</i>	Admissible if Government lays proper foundation and identifies proper witness.
8016G	LNCS 016 ADAMS - 1216657 PDF	Authentication - FRE 803(6)(A)-(C) /FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of LexisNexis Doc Custodian or others] -Relevance – FRE 401, 402 [Testimony of LexisNexis Doc Custodian or others]	<i>Objection – govt failed to fully identify the witness (BS)</i>	Admissible if Government lays proper foundation and identifies proper witness.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
8016H	LNCS 016 ADAMS - 1216657 Excel	Authentication - FRE 803(6)(A)-(C) /FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of LexisNexis Doc Custodian or others] -Relevance – FRE 401, 402 [Testimony of LexisNexis Doc Custodian or others]	<i>Objection – govt failed to fully identify the witness (BS)</i>	Admissible if Government lays proper foundation and identifies proper witness.
8016I	LNCS 020 BRACE - 1144486 PDF	Authentication - FRE 803(6)(A)-(C) /FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of LexisNexis Doc Custodian or others] -Relevance – FRE 401, 402 [Testimony of LexisNexis Doc Custodian or others]	<i>Objection – govt failed to fully identify the witness (BS)</i>	Admissible if Government lays proper foundation and identifies proper witness.
8016J	LNCS 020 BRACE - 1144486 Excel	Authentication - FRE 803(6)(A)-(C) /FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of LexisNexis Doc Custodian or others] -Relevance – FRE 401, 402 [Testimony of LexisNexis Doc Custodian or others]	<i>Objection – govt failed to fully identify the witness (BS)</i>	Admissible if Government lays proper foundation and identifies proper witness.
8016K	LNCS 022 CARPENTER - 1011685 PDF	Authentication - FRE 803(6)(A)-(C) /FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of LexisNexis Doc Custodian or others] -Relevance – FRE 401, 402 [Testimony of LexisNexis Doc Custodian or others]	<i>Objection – govt failed to fully identify the witness (BS)</i>	Admissible if Government lays proper foundation and identifies proper witness.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
8016L	LNCS 022 CARPENTER - 1011685 Excel	Authentication - FRE 803(6)(A)-(C) /FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of LexisNexis Doc Custodian or others] -Relevance – FRE 401, 402 [Testimony of LexisNexis Doc Custodian or others]	<i>Objection – govt failed to fully identify the witness (BS)</i>	Admissible if Government lays proper foundation and identifies proper witness.
8016M	LNCS 024 CRAWFORD - 1142278 PDF	Authentication - FRE 803(6)(A)-(C) /FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of LexisNexis Doc Custodian or others] -Relevance – FRE 401, 402 [Testimony of LexisNexis Doc Custodian or others]	<i>Objection – govt failed to fully identify the witness (BS)</i>	Admissible if Government lays proper foundation and identifies proper witness.
8016N	LNCS 024 CRAWFORD - 1142278 Excel	Authentication - FRE 803(6)(A)-(C) /FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of LexisNexis Doc Custodian or others] -Relevance – FRE 401, 402 [Testimony of LexisNexis Doc Custodian or others]	<i>Objection – govt failed to fully identify the witness (BS)</i>	Admissible if Government lays proper foundation and identifies proper witness.
8016O	LNCS 026 EMILII - 1090488 PDF	Authentication - FRE 803(6)(A)-(C) /FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of LexisNexis Doc Custodian or others] -Relevance – FRE 401, 402 [Testimony of LexisNexis Doc Custodian or others]	<i>Objection – govt failed to fully identify the witness (BS)</i>	Admissible if Government lays proper foundation and identifies proper witness.

EX. NO.	DESCRIPTION	Basis of Admissibility and/or Rules Under Which Government Seeks Admission	Basis of Defendant Objection and/or Rules Under Which Objection is/are Made	Court's Ruling
8016P	LNCS 026 EMILII - 1090488 Excel	Authentication - FRE 803(6)(A)-(C) /FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of LexisNexis Doc Custodian or others] -Relevance – FRE 401, 402 [Testimony of LexisNexis Doc Custodian or others]	<i>Objection – govt failed to fully identify the witness (BS)</i>	Admissible if Government lays proper foundation and identifies proper witness.
8016Q	LNCS 027 GHAMLOUCH - 191859 PDF	Authentication - FRE 803(6)(A)-(C) /FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of LexisNexis Doc Custodian or others] -Relevance – FRE 401, 402 [Testimony of LexisNexis Doc Custodian or others]	<i>Objection – govt failed to fully identify the witness (BS)</i>	Admissible if Government lays proper foundation and identifies proper witness.
8016R	LNCS 027 GHAMLOUCH - 191859 Excel	Authentication - FRE 803(6)(A)-(C) /FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of LexisNexis Doc Custodian or others] -Relevance – FRE 401, 402 [Testimony of LexisNexis Doc Custodian or others]	<i>Objection – govt failed to fully identify the witness (BS)</i>	Admissible if Government lays proper foundation and identifies proper witness.
8016S	LNCS 029 HENDLEY - 1168063 PDF	Authentication - FRE 803(6)(A)-(C) /FRE 901(a), 901(b)(1), (b)(4), 902(11), and 902(13) [Testimony of LexisNexis Doc Custodian or others] -Relevance – FRE 401, 402 [Testimony of LexisNexis Doc Custodian or others]	<i>Objection – govt failed to fully identify the witness (BS)</i>	Admissible if Government lays proper foundation and identifies proper witness.

IT IS SO ORDERED.

s/Matthew F. Leitman

MATTHEW F. LEITMAN

UNITED STATES DISTRICT JUDGE

Dated: April 18, 2023

I hereby certify that a copy of the foregoing document was served upon the parties and/or counsel of record on April 18, 2023, by electronic means and/or ordinary mail.

s/Holly A. Ryan

Case Manager

(313) 234-5126